

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

JOHN HANCOCK LIFE INSURANCE)	
COMPANY, JOHN HANCOCK)	
VARIABLE LIFE INSURANCE)	
COMPANY, and INVESTORS)	
PARTNER LIFE INSURANCE)	
COMPANY,)	
)	
Plaintiffs,)	Civil Action No. 03 CV 12501DPW
)	
v.)	Hon. Judge Douglas P. Woodlock
)	
ABBOTT LABORATORIES,)	
)	
Defendant.)	

ABBOTT LABORATORIES' MOTION TO FILE MEMORANDUM OVER 20 PAGES

Pursuant to Local Rule 7.1(B)(4), Abbott Laboratories ("Abbott") respectfully moves for leave to file a memorandum of law of twenty-nine pages in support of its Motion for Summary Judgment.

As grounds for this Motion, Abbott states that its Motion for Summary Judgment is a good faith attempt to dispose of the entire litigation, that the issues raised in its Motion for Summary Judgment are complex, and that Abbott respectfully believes a memorandum of law in excess of twenty pages will assist the Court in resolving the Motion. Abbott's counsel has worked diligently to reduce the length of its memorandum.

WHEREFORE, Abbott respectfully requests that the Court enter an order granting leave for Abbott to file a memorandum of twenty-nine pages in support of its Motion for Summary Judgment.

Respectfully submitted,

ABBOTT LABORATORIES

By: /s/ Michael S. D'Orsi

One Of Its Attorneys

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CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1(A)(2)

The undersigned hereby certifies he has conferred with counsel for John Hancock Life Insurance Company, John Hancock Variable Life Insurance Company, and Investors Partner Life Insurance Company and attempted in good faith to resolve or narrow the issues presented by this Motion.

/s/Michael S. D'Orsi
Michael S. D'Orsi

Dated: September 29, 2004